

**JOHN T. MORAN, JR., ESQ.**  
Nevada Bar No. 2271  
**JEFFERY A. BENDAVID, ESQ.**  
Nevada Bar No. 6220  
**JUSTIN W. SMERBER, ESQ.**  
Nevada Bar No. 10761  
**MORAN LAW FIRM, LLC**  
630 South Fourth Street  
Las Vegas, Nevada 89101  
(702) 384-8424  
Attorney for Defendants,  
*BLS Limousine Service of Las Vegas*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

THEODORE TRAPP, on his own behalf )  
and on behalf of all other similarly situated, )  
Plaintiff, )

vs. )

Case No. 2:09-CV-00995  
Dept. No.:

BIG POPPA'S, LLC a Nevada Limited )  
Liability Company d/b/a BADDA BING )  
MEN'S CLUB; SKY TOP VENDING, )  
INC., a Nevada Corporation d/b/a CAN )  
CAN ROOM; LA FUENTE, INC., a )  
Nevada Corporation d/b/a CHEETAS'S; )  
C.P. FOOD AND BEVERAGE, INC., a )  
Nevada Corporation d/b/a CLUB )  
PARADISE; DÉJÀ VU SHOWGIRLS OF )  
LAS VEGAS, LLC, a Nevada Limited )  
Liability Company d/b/a DÉJÀ VU )  
SHOWGIRLS; PALOMINO CLUB, INC., )  
A Nevada Corporation d/b/a PALOMINO )  
CLUB; SHAC, LLC, a Nevada Limited )  
Liability Company d/b/a SAPPHIRE; K- )  
KEL, INC., a Nevada Corporation d/b/a )  
SPEARMINT RHINO; D2801 )  
WESTWOOD, INC. a Nevada Corporation )  
d/b/a TREASURES; LITTLE DARLINGS )  
OF LAS VEGAS, LLC, a Nevada Limited )  
Liability Company d/b/a LITTLE )  
DARLINGS; O.G. ELIADES, A.D., LLC, )  
a Nevada Limited Liability Company d/b/a )  
OLYMPIC GARDENS; LAS VEGAS )

**DEMAND FOR SECURITY OF COSTS**

DATE OF HEARING: N/A  
TIME OF HEARING: N/A



**MORAN LAW FIRM, LLC**  
MORAN BRANDON BENDAVID MORAN  
ATTORNEYS AT LAW

630 SOUTH 4TH STREET  
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PHONE: (702) 384-8424  
FAX: (702) 384-6568

1 ENTERTAINMENT, a Nevada Limited )  
 Liability Company d/b/a LARRY )  
 2 FLYNT'S HUSTLER CLUB; MICHAEL )  
 3 A. SALTMAN d/b/a MINXX; RICK'S )  
 LAS VEGAS; FRIAS MANAGEMENT, )  
 4 LLC., a Nevada Limited Liability )  
 Company d/b/a ACE CAB COMPANY )  
 5 and A-NORTH LAS VEGAS CAB; )  
 6 WESTERN CAB COMPANY, a Nevada )  
 Corporation d/b/a WESTERN CAB )  
 7 COMPANY AND WESTERN )  
 LIMOUSINE; NEVADA CHECKER CAB )  
 8 CORPORATION, NEVADA STAR CAB )  
 CORPORATION, a Nevada Corporation )  
 9 d/b/a STAR CAB COMPNAY; NEVADA )  
 10 YELLOW CAB COMPANY, a Nevada )  
 Corporation d/b/a YELLOW CAB )  
 11 COMPANY; LUCKY CAB COMPANY )  
 OF NEVADA, a Nevada Corporation d/b/a )  
 12 LUCKY TRANS; SUN CAB, INC., a )  
 Nevada Corporation d/b/a NELLIS CAB )  
 13 COMPANY; CLS NEVADA, LLC, a )  
 Nevada Limited Liability Company d/b/a )  
 14 CLS TRANSPORTATION; BLS )  
 15 LIMOUSINE SERVICE OF LAS VEGAS; )  
 16 DESERT CAB, INC., a Nevada )  
 Corporation d/b/a DESERT CAB )  
 17 COMPANY and ODYSSEY )  
 LIMOUSINE; BELL TRANS A NEVADA )  
 18 CORPORATION, a Nevada Corporation )  
 d/b/a BELL TRANS; TONY CHONG, an )  
 19 individual; and DOE EMPLOYEES 1- )  
 20 1000; )  
 21 Defendants. )

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TO: THEODORE TRAPP, Plaintiff; and

TO: JAY EDELSON, RAFFEY BALABANIAN, and JAMES SMYTH,  
his attorneys.

Pursuant to NRS 18.130, Defendant, BLS LIMOUSINE SERIVCE OF  
LAS VEGAS hereby makes demand upon Plaintiff, who resides out of State, for



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1 security in the amount of Five Hundred and No/100 Dollars (\$500.00) for costs and  
2 charges which may be awarded herein against Plaintiff. The requirements of NRS  
3 18.130 apply to actions in the United States District Court, District of Nevada.  
4 *Truck Ins. Exchange*, 683 F. Supp. 223, 227-28 (D. Nev. 1988); *Hamar v. Hyatt*  
5 Corp, 98 F.R.D.  
6 305, 305-306 (D. Nev. 1983).  
7

8 Dated this 29<sup>th</sup> day of June, 2009.

9 **MORAN LAW FIRM, LLC**

10 /s/: Jeffery A. Bendavid, Esq.

11 **JOHN T. MORAN, JR., ESQ.**

12 Nevada Bar No.: 2271

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15 **JUSTIN W. SMERBER, Esq.**

16 Nevada Bar No.: 10761

17 630 S. Fourth Street

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20 Attorney for Defendant,

21 *BLS Limousine Service of Las Vegas*  
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**CERTIFICATE OF MAILING**

I hereby certify that on the 25<sup>th</sup> day of June, 2009, I served the foregoing  
DEFENDANT, WESTERN CAB COMPANY'S DEMAND FOR SECURITY OF  
COSTS to the Clerk's Office using the CM/ECF System for filing and transmittal  
of a Notice of Electronic Filing to the counsel listed below, who have registered to  
receive Electronic Filing:

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